

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

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SUBJECT: Partial Compliance Evaluation of Gulf Oil Terminal, New Haven, CT

FROM: Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit

EALS/27/14

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit

CMS 5/27/14

TO: File

I. Facility Information

- A. Facility Name: Gulf Oil
- B. Facility Location: 500 Waterfront Street, New Haven, CT
- C. Facility Mailing Address: same
- D. Facility Contact: Joe Sierejko, Terminal Manager
- E. Type of Source (major/minor/sm/sm80): major
- F. Date Title V permit issued: NA
- G. AFS #: 0900900004

II Background Information

- A. Date of inspection: April 28, 2014
- B. Weather Conditions: partly cloudy, temperatures in the 50's
- C. US EPA Representative(s):
 Beth Kudarauskas, Air Tech Unit, OES
 Steve Rapp, OES
 Bill Osbahr, OEME
 Mike Looney, OEME
- D. State Representative(s):
 Deb Tedford

III Purpose of Inspection

The purpose of this inspection was to conduct a focused leak detection and repair inspection and monitor pressure at the facility loading rack. Due to the limited space within the facility, EPA did not request access for the GMAP vehicle to enter the facility.

IV Facility Description

Company / Facility History

The Gulf Terminal in New Haven, CT is a petroleum storage and distribution terminal. In addition to other products such as home heating oil, Gulf stores and distributes gasoline and ethanol. The terminal is equipped with a vapor recovery unit to control emissions from the storage and distribution of gasoline and ethanol.

V Inspection

A. Entry

The EPA inspectors arrived unannounced at the Gulf Oil Terminal facility located on Waterfront Street at approximately 1:30pm. The EPA inspectors (Ms. Kudarauskas, Mr. Looney, Mr. Osbahr, and Mr. Rapp) showed their credentials to Mr. Joe Sierejko, the Terminal Manager.

B. Opening Conference

Ms. Kudarauskas led a very brief opening conference. She explained that the focus of the inspection was to monitor Gulf's loading rack and pressure vacuum relief vent (PVRV) for leaks and/or excess emissions. In addition, Mr. Osbahr discussed the monitoring equipment that he planned to use, including the forward looking infra-red (FLIR) camera and pressure gauge.

Ms. Kudarauskas also told Mr. Sierejko that the GMAP vehicle was in the area. She described the vehicle to Mr. Sierejko so he would recognize the vehicle. Because there was construction along the facility perimeter and the facility has limited space, the inspectors did not request access for the GMAP vehicle to enter the Gulf facility.

C. Plant Walkthrough

Mr. Sierejko reviewed basic safety procedures for the loading rack area and then led the inspectors to the facility loading rack. Mr. Sierejko stayed at the loading rack with the inspectors that were connecting the pressure gauge to trucks. Mr. Sierejko pointed the inspectors to the other side of the terminal to monitor the PVRV using the FLIR.

The Gulf terminal has a total of 8 truck loading bays. The facility has 2 carbon bed systems. The smaller system is a backup to the larger, main carbon bed. Mr. Sierejko said that the most recent performance test was conducted in June 2013. Both carbon beds were tested during the performance test.

To check the pressure, Mr. Osbahr had facility personnel attach the pressure monitoring coupling to the vapor hose on a truck in Bay 4. Mr. Looney used the FLIR camera to observe any leaks in the facility vapor collection system. When the truck began loading product, Mr. Looney observed the facility PVRV using the FLIR. Vapors were not detected from the PVRV using the FLIR. The maximum pressure observed during truck loading was 10 inches water in Bay 4.

Using the FLIR, Mr. Looney detected gasoline vapors in the area of the PVRV from a nearby

tank. When asked about the tank, Mr. Sierejko stated that the tank was a gasoline tank that was currently receiving product from a vessel. Mr. Sierejko stated that the gasoline level in the tank was very low such that the roof was not floating but most likely landed on its legs above the level of the gasoline.

Mr. Looney then observed trucks at the loading rack using the FLIR. A vapor recovery hose in bay 4 was identified to be leaking using the FLIR. Facility personnel immediately changed out the leaking vapor recovery hose. When the leaking vapor recovery hose was detached from the loading bay inspectors observed approximately one half gallon of liquid gasoline spill from the vapor recovery line onto the ground.

D. Closing Conference

The inspectors conducted a brief closing conference at the end of the inspection. Ms. Kudarauskas reviewed the inspection findings including the leaking vapor recovery hose. Ms. Kudarauskas informed Mr. Sierejko that the PVRV was not releasing vapors at the time of the inspection as indicated by the FLIR camera. Ms. Kudarauskas discussed the vapors that were detected from Tank 111. Mr. Sierejko stated that the gasoline level in the tank was such that the roof was now floating on the product surface and the emissions should decrease.

Mr. Sierejko asked the inspectors if they were familiar with the new CT requirements to control emissions during ozone season when tanks are taken out of service for cleaning. Ms. Tedford from CT DEEP said that she would get back to Mr. Sierejko with an answer to his question.

The inspectors thanked Mr. Sierejko for his time.

